

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., <u>et al.</u> ,)	Case No. 01-1139 (JKF)
)	(Jointly Administered)
Debtors.)	

Objection Deadline: June 10, 2005
Hearing Date: June 27, 2005 at 12:00 p.m.

**NOTICE OF FILING DEBTORS' ELEVENTH
OMNIBUS OBJECTION TO CLAIMS (NON-ASBESTOS GATEWAY)**

PLEASE TAKE NOTICE that on May 18, 2005, the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Eleventh Omnibus Objection to Claims (Non-Asbestos Gateway) (the "Non-Asbestos Gateway Omnibus Objection") with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that the following parties will receive a copy of the Non-Asbestos Gateway Omnibus Objection (with all exhibits): (i) the U.S. Trustee; (ii) the Core Group as defined in the current Case Management Procedures; and (iii) the 2002 List. In addition, the Debtors' claims consultant, Bankruptcy Management Corporation ("BMC"), will serve a copy of the Non-Asbestos Gateway Omnibus Objection and a customized Notice summarizing claim detail exactly as reflected in the Exhibit on which such creditor is listed upon those creditors that have filed claims that are affected by the Non-Asbestos Gateway Omnibus Objection in lieu of serving all Exhibits. Any party may obtain a copy of the Non-Asbestos Gateway Omnibus Objection with all Exhibits or a copy of the Debtors' Declaration in

Support of the Objection by requesting the same from BMC at (888) 909-0100 or by going onto the BMC website at <http://www.bmccorp.net/wrgrace>.

PLEASE TAKE FURTHER NOTICE that

1. A hearing on the Non-Asbestos Gateway Omnibus Objection will be held before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware on **June 27, 2005 at 12:00 p.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Non-Asbestos Gateway Omnibus Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, 824 Market Street, Wilmington, Delaware 19801, and serve a copy of the response upon Kirkland & Ellis LLP, Attn: Rachel R. Schulman, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and upon Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C., Attn: David W. Carickhoff, Jr., 919 N. Market Street, 16th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), so as to be received on or before **June 10, 2005 at 4:00 p.m. (Eastern Time)**. Only those responses timely filed with the Court and received by the Debtors' counsel will be considered by the Court.

3. If no response is filed, served and received by June 10, 2005, at 4:00 p.m. (Eastern Time) the Court will be requested to enter an order, similar to the attached form of proposed order disallowing, expunging, and/or reclassifying the Claim(s) as requested in the Non-Asbestos Gateway Omnibus Objection.

4. Any response should contain the following:

a. a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of the Objection to which the response is directed;

- b. the name and contact information (including daytime telephone number) of the claimant and a description of the basis for the amount of the claim;
- c. the claim number(s) of the claim objection(s) to which the response is directed;
- d. the specific factual basis and supporting legal argument upon which the party will rely in opposing the Non-Asbestos Gateway Omnibus Objection; and
- e. any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim.

5. If you file a response to the Non-Asbestos Gateway Omnibus Objection, you should be prepared to argue that response at the Claims Hearing unless you reach an agreement with the Debtors' counsel to continue or resolve your matter.

6. You need not respond to the Non-Asbestos Gateway Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Non-Asbestos Gateway Omnibus Objection. If you do not timely file and serve a response to the Non-Asbestos Gateway Omnibus Objection, the relief requested in the Non-Asbestos Gateway Omnibus Objection may be granted without further notice to you. Failure to timely file a response to the Non-Asbestos Gateway Omnibus Objection shall be deemed (i) waiver of your right to respond to the Non-Asbestos Gateway Omnibus Objection and (ii) your consent to the relief requested in the Non-Asbestos Gateway Omnibus Objection respecting your Claim.

7. The Debtors reserve the right to file and serve a reply to a claimant's Response. **If you have any questions regarding your claim(s) you should contact**

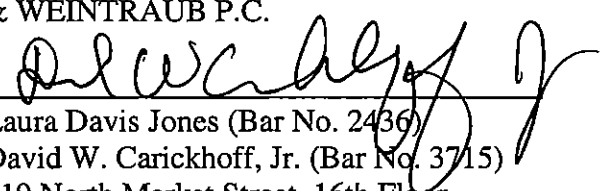
Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Ninth Omnibus Objection, please call Rachel Schulman at Kirkland & Ellis LLP at (312) 861-2441.

Dated: May 18, 2005

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and

PACHULSKI, STANG, ZIEHL, YOUNG, JONES
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